REMARKS

This is a full and timely response to the outstanding Office Action mailed May 11, 2005. Upon entry of the amendments in this response, claims 12 - 31 remain pending. In particular, Applicant has amended 21. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

Indication of Allowable Subject Matter

The Office Action indicates that claims 14 – 18 and 20 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim sand any intervening claims. As described in detail below, Applicant respectfully asserts that independent claim 12, from which claims 14 – 18 depend, and independent claim 19, from which claim 20 depends, are in condition for allowance. Therefore, Applicant respectfully asserts claims 14 – 18 and 20 are in condition for allowance without amendment.

Claim Objections

The Office Action indicates that claim 21 is objected to because of various informalities. As set forth above, Applicant has amended claim 21 and respectfully asserts that the rejection has been accommodated.

Rejections Under 35 U.S.C. §102

The Office Action indicates that claims 12, 13, 19, 21 - 23, 26 and 31 stand rejected under 35 U.S.C. §102(e) as being anticipated by *Forbes*. Applicant respectfully traverses the rejection.

In this regard, Applicant submit herewith a Declaration under 37 C.F.R. 1.131 indicating that the invention was conceived prior to the critical date of *Forbes*. In particular, the critical date of *Forbes* is February 8, 2001 (the filing date of the parent application). The Declaration also shows that Applicant exercised diligence through the constructive reduction to practice of the invention. That is, the Applicant exercised diligence through the filing date of the application. Applicant respectfully asserts that such showing renders the use of *Forbes* inapplicable for rejecting the pending claims and respectfully requests that the rejection be removed. Therefore, Applicants respectfully requests that the claims 12, 13, 19, 21 – 23, 26 and 31 be placed in condition for allowance.

Additionally, and irrespective of whether *Forbes* may be properly asserted against the pending claims, Applicant respectfully notes that *Forbes* does not teach or otherwise disclose the limitations recited in the pending claims. In this regard, *Forbes* generally relates to flipchip mounting of semiconductor substrates. Specifically, *Forbes* discloses:

Referring to FIGS. 9 and 10, substrate 12 may also support fabricated circuit devices 64 and multi-layer wiring patterns and may be encapsulated by encapsulant 68 in a single integrated package. In such an implementation multiple exterior terminals 70 are provided for connecting interior packaged conductors to an external circuit. In addition, substrate 12 may be a carrier which is used to mount, support and interconnect other integrated circuit chips 66 mounted over one or both of the surfaces 14, 16.

(Forbes at [0031]). (Emphasis Added).

In particular, the Office Action indicates that component 68 of *Forbes* corresponds to Applicant's second dielectric material. However, as is described in detail below, the encapsulant 68 of *Forbes* does not exhibit the features/limitations recited in Applicant's claims.

For example, claim 12 recites:

12. A method for electrically isolating a portion of a wafer comprising: providing a first wafer; forming a first conductor at least partially through the first wafer;

disposing first dielectric material between the first conductor and material of the first wafer; and

at least partially surrounding the first conductor and the first dielectric material with second dielectric material, the second dielectric material being spaced from the first dielectric material such that a first portion of the material of the first wafer is arranged between the first dielectric material and the second dielectric material and a second portion of the material of the first wafer is arranged outside an outer periphery of the second dielectric material.

(Emphasis Added).

Applicant respectfully asserts that *Forbes* is legally deficient for the purpose of anticipating claim 12. In particular, Applicant respectfully asserts that *Forbes* does not teach or otherwise disclose at least the features/limitations emphasized above in claim 12. Specifically, the encapsulant 68 of Forbes is not structured such that a second portion of the material of the first wafer is arranged outside an outer periphery of the second dielectric material. Therefore, Applicant respectfully asserts that claim 12 is in condition for allowance.

Rejections Under 35 U.S.C. §103

The Office Action indicates that claims 24, 25 and 27 - 30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Forbes* in view of *Ahn*. Applicant respectfully traverses the rejections. In particular, Applicants respectfully assert that the use of *Forbes* is improper for rejecting the pending claims as set forth above. Further, *Ahn* is legally deficient for the purpose of remedying the deficiencies of *Forbes*. That is, *Ahn* does not teach or reasonably suggest the limitations asserted in the Office Action as being taught by *Forbes*. Therefore, Applicant respectfully requests that the rejections be removed and that the claims be placed in condition for allowance.

Cited Art Made of Record

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above,
Applicant respectfully submits that all objections and/or rejections have been traversed,
rendered moot, and/or accommodated, and that the pending claims are in condition for
allowance. Favorable reconsideration and allowance of the present application and allpending claims are hereby courteously requested. If, in the opinion of the Examiner, a
telephonic conference would expedite the examination of this matter, the Examiner is invited to
call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

M. Paul Qualey, Reg/No. 43,024

THOMAS, KAYDEN,
HORSTEMEYER & RISLEY, L.L.P.
Suite 1750
100 Galleria Parkway N.W.

Atlanta, Georgia 30339

(770) 933-9500

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450,

on <u>8////05</u>.

Signature